REMARKS

Reconsideration of the subject application is respectfully requested.

Claims 1-2, 7-8, 10-11, 17-18, 22, and 26 were rejected under 35 U.S.C. 103(a) as being unpatentable over Engelmann in view of Tsukamoto. This rejection is respectfully traversed.

The subject invention is directed to a novel wrist-watch device in which at least one of the hands of a mechanically driven time display is used to display non-time (e.g. balance) information in accordance with non-time data that is stored in the device. This allows the user that is wearing a traditional wrist-watch with a mechanically driven display to be informed of non-time information just by looking at the display (mechanically driven hands or dials) on his or her watch. Various examples are given in the specification. See, for example, the specification beginning at page 21, line 6 and Figs. 15 and 16. In the first display example discussed, the distance traveled by the second hand displays the balance. This unique feature, specifically recited in independent Claims 1, 17, 22 and 26 is neither shown nor suggested by the prior art.

Engelmann discloses a watch with a mechanically driven time display with hands 4, 6, and 8. Engelmann also discloses an electronic module 28 that has a memory MEM for storing "useful data" such as an identification code (Fig. 3, and col. 1, lines 47-48, and col. 5, lines 7-8). However, Engelmann fails to disclose or suggest displaying non-time information in accordance with this data and certainly does not disclose or suggest using the hands of the watch to display the information.

Tsukamoto discloses a combination camera and wristwatch. The wristwatch has a display 200 and a memory 205 that may have an area for saving an image received from the camera. This non-time data may be displayed on display 200. However, display 200 is a liquid crystal display (col. 7, line 22). So, what Tsukamoto discloses and suggests is that stored data can be displayed on a liquid crystal display. At best, if the teachings of Tsukamoto were used to modify Engelmann, than the combination would result with an Engelmann type watch with a liquid crystal display for displaying the information in

Engelmann's memory. However, this is not what is being claimed. Tsukamoto does not begin to disclose or suggest how Engelmann would or could be modified so that the mechanically driven hands of Engelmann could display non-time information in accordance with the stored data. The remaining references cited by the Examiner also fail to disclose or suggest a device or method for displaying non-time information on a mechanically driven display (hands or dials) in accordance with the stored data.

Each of the independent claims now further recite a comparator unit or step that compares a value of said stored data with a value of predetermined data, and that generates comparison result data, wherein said timepiece control unit controls said time display member to display non-time information in accordance with said comparison result data. See, the specification at page 16, line 5 to 18, and Fig. 8, for example. The timepiece control unit 14 receives the balance Da and compares it to the minimum fare data stored in RAM. If the balance is insufficient, the timepiece control unit controls the second-hand moving mechanism to display the result (e.g. by performing an irregular movement as recited in Claim 3, discussed below). The prior art fails to disclose or suggest this specifically recited feature. Tsukamoto checks only if data is received and if the received data is in the correct format (e.g., col. 8, line 61 to col.9, line 11). Tsukamoto does not check or compares values, as specifically recited.

The dependent claims recited yet additional novel features that are neither disclosed nor suggested.

Claim 3, for example, recites that the second hand of the timepiece performs an irregular movement in accordance with the comparison result data generated in Claim 1. See, for example, the specification at page 16, lines 13-19, where if the balance is insufficient, the second hand 40 performs an irregular operation, e.g. moving once every 3 seconds. This gives the user of the mechanical watch a visual indication that there are insufficient funds for him or her to pass through a gate, for example. The other dependent claims recite other features relating to displaying non-time information on the mechanically driven time display member (hands or dial) of the wristwatch.

Customer No. 20178 Response A In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration of the present application.

Respectfully submitted,

Mark P. Watson

Registration No. 31,448

Please address all correspondence to:

Epson Research and Development, Inc. Intellectual Property Department 150 River Oaks Parkway, Suite 225 San Jose, CA 95134

Phone: (408) 952-6000 Facsimile: (408) 954-9058 Customer No. 20178

Date: December 14, 2004